

Johnstone, Jeremy

From: Johnstone, Jeremy
Sent: Tuesday, August 06, 2013 5:24 PM
To: Ron Quesada
Cc: Cliff Townsend; Michael L. Kaleikini; Bodine, Diane C.; Helmlinger, Andrew
Subject: Notice of U.S. EPA Inspection of Puna Geothermal Venture facility beginning on Tuesday 20 August 2013 beginning at 8:30 am
Attachments: PGV List of Docs Requested for Review 20Aug13.pdf

Dear Mr. Ron Quesada -

In follow-up to our telephone conversation earlier today, this is to advise you of a planned visit to and inspection of the Puna Geothermal Venture facility located at 14-3860 Kapoho-Pahoa Road in Pahoa, HI beginning on Tuesday 20 August 2013 at 8:30 am.

The inspection is an element of our ongoing compliance evaluation of industrial facilities that are subject to the Clean Air Act of 1990 as amended, Section 112(r) regarding the Risk Management Program, and General Duty Clause, and the requirements of the Emergency Planning and Community Right-to-Know Act of 1986, EPCRA, Sections 302-312 and the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Section 103. The principal focus of the inspection will be the compliance of the facility and its pentane and hydrogen sulfide abatement systems with these requirements.

We estimate that the inspection should take two consecutive days over approximately eight hours each day. On the first day we will focus on the facility's covered pentane process and compliance with the Risk Management Program requirements of CAA §112(r)(7) and 40 CFR Part 68. The second day's activities will be primarily dedicated to an evaluation of the facility's compliance with the General Duty Clause of CAA Section 112(r)(1) with respect to the facility's hydrogen sulfide abatement, emergency shutdown, and emergency steam relief systems. I acknowledge that in our earlier discussion you informed me that the facility would be in shutdown mode, we would not be viewing it in normal operating conditions, and that you and others with whom we may need to interact may be periodically unavailable.

The inspection team will tentatively include Jeremy Johnstone from the US EPA Region IX Emergency Response, Prevention and Preparedness Branch with support from Science Application International Corporation (SAIC), a contractor to US EPA Region 9. Staff from the Hawaii County Fire Department may also participate under their own authority.

Attached is a list of records and documents that we typically review. We understand that some of the items may not apply to your facility or may not be immediately available. To avoid delays, we recommend that the documents be available on site, or if you would prefer, you can send some of those documents to our office for advance review. Please make notation of documents that you do not hold at this time or cannot be located. On the day of the inspection please make the documents available for review in a conference room or large office that can also serve as the location for interviews and discussion. As a further acknowledgement, in response to our Information Request of June 20th, you provided us with the documents that we had requested with respect to the facility's hydrogen sulfide abatement, emergency shutdown, and emergency steam relief systems. In addition to what is requested in the attachment to this email please also have these documents (to the extent that they are not duplicative of what is requested in the attachment) available for us during our inspection.

Finally, CAA Section 112(r)(6)(L) provides facility employees and employee representatives with the same rights to participate in the physical inspection of any workplace conducted pursuant to CAA Section 112(r) as provided in the Occupational Safety and Health (OSH) Act (29 CFR 1903.8). Therefore, this is to request that you notify your facility's employee representative(s) of this inspection and make arrangement for their participation in the inspection. In the event that your facility is non-union, then please notify and invite an employee, or employees, familiar with the operation of the processes regulated under Clean Air Act Section 112(r), to similarly participate. Please also provide a copy of this Notice of Inspection to the employee representative(s) and also post a copy in the area subject to the inspection.

Please confirm receipt of this email and acknowledgement of the planned inspection either via telephone or e-mail, and please also let us know what personal protective equipment (PPE) will be required to go out into the facility. Please also feel free to contact me if you have any questions or comments regarding our visit.

Thank you in advance for your cooperation in this matter.

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